

JS 44 (Rev. 12/12)

**CIVIL COVER SHEET**

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

<b>I. (a) PLAINTIFFS</b> MEGHAN DELONG	<b>DEFENDANTS</b> OXFORD LAW, LLC
<b>(b)</b> County of Residence of First Listed Plaintiff _____ (EXCEPT IN U.S. PLAINTIFF CASES)	County of Residence of First Listed Defendant <u>PHILADELPHIA</u> (IN U.S. PLAINTIFF CASES ONLY) NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.
<b>(c)</b> Attorneys (Firm Name, Address, and Telephone Number) CRAIG THOR KIMMEL, KIMMEL & SILVERMAN, P.C. 30 EAST BUTLER PIKE, AMBLER, PA 19002 PHONE: (215) 540-8888 EXT. 116	Attorneys (If Known)

<b>II. BASIS OF JURISDICTION</b> (Place an "X" in One Box Only)	<b>III. CITIZENSHIP OF PRINCIPAL PARTIES</b> (Place an "X" in One Box for Plaintiff and One Box for Defendant)																					
<input type="checkbox"/> 1 U.S. Government Plaintiff <input type="checkbox"/> 2 U.S. Government Defendant <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="text-align: left;">(For Diversity Cases Only)</th> <th>PTF</th> <th>DEF</th> </tr> <tr> <td>Citizen of This State</td> <td><input type="checkbox"/> 1</td> <td><input type="checkbox"/> 1</td> </tr> <tr> <td>Citizen of Another State</td> <td><input type="checkbox"/> 2</td> <td><input type="checkbox"/> 2</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td><input type="checkbox"/> 3</td> <td><input type="checkbox"/> 3</td> </tr> <tr> <td>Incorporated or Principal Place of Business In This State</td> <td><input type="checkbox"/> 4</td> <td><input type="checkbox"/> 4</td> </tr> <tr> <td>Incorporated and Principal Place of Business In Another State</td> <td><input type="checkbox"/> 5</td> <td><input type="checkbox"/> 5</td> </tr> <tr> <td>Foreign Nation</td> <td><input type="checkbox"/> 6</td> <td><input type="checkbox"/> 6</td> </tr> </table>	(For Diversity Cases Only)	PTF	DEF	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
(For Diversity Cases Only)	PTF	DEF																				
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1																				
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Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5																				
Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																				

<b>IV. NATURE OF SUIT</b> (Place an "X" in One Box Only)					
<b>CONTRACT</b> <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<b>FORFEITURE/PENALTY</b> <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<b>BANKRUPTCY</b> <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157	<b>OTHER STATUTES</b> <input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input checked="" type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities Employment <input type="checkbox"/> 446 Amer. w/Disabilities Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	<b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark	<b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))
<b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609			<b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions		

<b>V. ORIGIN</b> (Place an "X" in One Box Only)
<input checked="" type="checkbox"/> 1 Original Proceeding <input type="checkbox"/> 2 Removed from State Court <input type="checkbox"/> 3 Remanded from Appellate Court <input type="checkbox"/> 4 Reinstated or Reopened <input type="checkbox"/> 5 Transferred from Another District (specify) <input type="checkbox"/> 6 Multidistrict Litigation

<b>VI. CAUSE OF ACTION</b>	Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 15 U.S.C. § 1692 et seq. Brief description of cause: FAIR DEBT COLLECTION PRACTICES ACT
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<b>VII. REQUESTED IN COMPLAINT:</b>	<input type="checkbox"/> CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.	DEMAND \$ _____	CHECK YES only if demanded in complaint: JURY DEMAND: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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<b>VIII. RELATED CASE(S) IF ANY</b> (See instructions):	JUDGE _____ DOCKET NUMBER _____
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DATE 08/28/2015 SIGNATURE OF ATTORNEY OF RECORD \_\_\_\_\_

FOR OFFICE USE ONLY

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_

## UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 1940 Griffins Green Place, Bartow, FL 33830

Address of Defendant: 1100 Northbrook Drive, Suite 250, Trevose, PA 19053

Place of Accident, Incident or Transaction: \_\_\_\_\_  
(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?  
(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a)) Yes ☐ No ☒

Does this case involve multidistrict litigation possibilities? Yes ☐ No ☒

RELATED CASE, IF ANY:

Case Number: \_\_\_\_\_ Judge \_\_\_\_\_ Date Terminated: \_\_\_\_\_

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?  
Yes ☐ No ☒

CIVIL: (Place ☒ in ONE CATEGORY ONLY)

A. Federal Question Cases:

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts
2. ☐ FELA
3. ☐ Jones Act-Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management Relations
7. ☐ Civil Rights
8. ☐ Habeas Corpus
9. ☐ Securities Act(s) Cases
10. ☐ Social Security Review Cases
11. ☒ All other Federal Question Cases  
(Please specify) 15 U.S.C. § 1692 et seq.

B. Diversity Jurisdiction Cases:

1. ☐ Insurance Contract and Other Contracts
2. ☐ Airplane Personal Injury
3. ☐ Assault, Defamation
4. ☐ Marine Personal Injury
5. ☐ Motor Vehicle Personal Injury
6. ☐ Other Personal Injury (Please specify)
7. ☐ Products Liability
8. ☐ Products Liability — Asbestos
9. ☐ All other Diversity Cases

(Please specify) \_\_\_\_\_

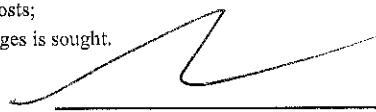
ARBITRATION CERTIFICATION

(Check Appropriate Category)

I, CRAIG THOR KIMMEL, counsel of record do hereby certify:

- ☐ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;
- ☐ Relief other than monetary damages is sought.

DATE: 08-28-15



Attorney-at-Law

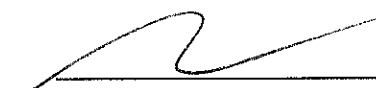
57100

Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 08-28-15



Attorney-at-Law

57100

Attorney I.D.#

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**CASE MANAGEMENT TRACK DESIGNATION FORM**

MEGHAN DELONG  
v.  
OXFORD LAW, LLC

CIVIL ACTION

NO.

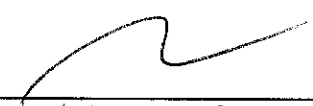
In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

**SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:**

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ( )
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ( )
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. (X)
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ( )
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ( )
- (f) Standard Management – Cases that do not fall into any one of the other tracks. ( )

08-28-15

**Date**

  
**Attorney-at-law**

Plaintiff, Meghan DeLong  
**Attorney for**

215-540-8888 x 116

**Telephone**

877-788-2864

**FAX Number**

kimmel@creditlaw.com

**E-Mail Address**

1                                   **UNITED STATES DISTRICT COURT**  
2                                   **FOR THE**  
3                                   **EASTERN DISTRICT OF PENNSYLVANIA**

4 MEGHAN DELONG,                                   )  
5                                   )                                   )  
6                                   Plaintiff                                   )                                   )  
7                                   v.                                   )                                   )  
8                                   )                                   **Case No.:**  
9                                   )                                   )  
10                                   )                                   **COMPLAINT AND DEMAND FOR**  
11                                   )                                   **JURY TRIAL**  
12                                   )                                   )  
13                                   Defendant                                   )                                   )  
14                                   )                                   **(Unlawful Debt Collection Practices)**

11                                   **COMPLAINT**

12                                   MEGHAN DELONG (“Plaintiff”), by and through her attorneys, KIMMEL  
13 & SILVERMAN, P.C., alleges the following against OXFORD LAW, LLC  
14 (“Defendant”):

16                                   **INTRODUCTION**

17                                   1.     Plaintiff’s Complaint is based on the Fair Debt Collection Practices  
18 Act, 15 U.S.C. § 1692 *et seq.* (“FDCPA”).

20                                   **JURISDICTION AND VENUE**

21                                   2.     Jurisdiction of this court arises pursuant to 15 U.S.C. § 1692k(d),  
22 which states that such actions may be brought and heard before “any appropriate  
23 United States district court without regard to the amount in controversy,” and 28

1 U.S.C. § 1331 grants this court original jurisdiction of all civil actions arising  
2 under the laws of the United States.

3  
4 3. Defendant conducts business in the Commonwealth of Pennsylvania  
5 and as such, personal jurisdiction is established.

6 4. Venue is proper pursuant to 28 U.S.C. §§ 1391(b)(1) and (b)(2).

7  
8 **PARTIES**

9 5. Plaintiff is a natural person residing in Bartow, Florida 33830.

10 6. Plaintiff is a “consumer” as that term is defined by 15 U.S.C.  
11 §1692a(3).

12 7. Defendant is a national debt collection company with its corporate  
13 headquarters located at 1100 Northbrook Drive, Suite 250, Trevose, Pennsylvania  
14 19053.

15  
16 8. Defendant is a “debt collector” as that term is defined by 15 U.S.C. §  
17 1692a(6), and repeatedly contacted Plaintiff in an attempt to collect a debt.

18  
19 9. Defendant acted through its agents, employees, officers, members,  
20 directors, heirs, successors, assigns, principals, trustees, sureties, subrogees,  
21 representatives, and insurers.

22 **FACTUAL ALLEGATIONS**

23  
24 10. At all pertinent times hereto, Defendant was hired to collect a  
25 consumer debt and attempted to collect that debt from Plaintiff.

1        11. The alleged debt at issue, a student loan, arose out of transaction,  
2 which were primarily for personal, family or household purposes.

3  
4        12. Plaintiff never incurred any debt in connection with a business or  
5 commercial activities, and therefore, the debt, if truly an obligation owed by her  
6 could only have arisen from financial obligation for primarily personal, family or  
7 household purposes.

8  
9        13. Beginning in or around October 2014, and continuing thereafter,  
10 Defendant continuously and repeatedly contacted Plaintiff on her cellular phone in  
11 its attempt to collect a consumer debt.

12  
13        14. When the parties spoke on October 29, 2014, Defendant claimed that  
14 Plaintiff owed \$8,000.00, but that it would accept \$3,000.00 to satisfy the debt if  
15 Plaintiff paid in the next three (3) days.

16  
17        15. Plaintiff disputed the debt, explaining that it was past the statute of  
18 limitations to collect, and refused to make payment.

19        16. Defendant deceptively claimed that they needed to “escalate it to the  
20 next level” and take Plaintiff “to court.”

21  
22        17. Upon information and belief, Defendant did not intend to take any  
23 legal action against Plaintiff, but rather made these statements believing that it  
24 would cause Plaintiff to make payment on the debt.

25        18. When Defendant failed to secure payment from Plaintiff, Defendant

1 contacted Plaintiff's father and disclosed that Plaintiff owed a debt.

2 19. At no time did Defendant have Plaintiff's consent to disclose debt  
3 information to third parties, including her father.  
4

5 20. Defendant's disclosure of debt information to Plaintiff's father was  
6 embarrassing and harassing.

7 21. Finally, in its attempts to collect the alleged debt, Defendant  
8 attempted to withdraw funds from Plaintiff's bank account without her  
9 authorization.  
10

11 **DEFENDANT VIOLATED THE**  
12 **FAIR DEBT COLLECTION PRACTICES ACT**

13 **COUNT I**

14 22. Defendant's conduct, as detailed in the preceding paragraphs, violated  
15 15 U.S.C. § 1692c(b).  
16

17 a. A debt collector violates § 1692c(b) of the FDCPA by  
18 communicating with a third party, in connection with the  
19 collection of any debt, without prior permission given by the  
20 consumer.  
21

22 b. Here, Defendant violated § 1692c(b) when it called Plaintiff's  
23 father and discussed the manner absent consent from Plaintiff to  
24 do so.  
25

**COUNT II**

23. Defendant's conduct, as detailed in the preceding paragraphs, violated 15 U.S.C. §§ 1692d and 1692d(5).

a. A debt collector violates § 1692d of the FDCPA by engaging in conduct of the natural consequence of which is to harass, oppress, or abuse any person in connection with the collection of a debt.

b. A debt collector violates § 1692d(5) of the FDCPA by causing a telephone to ring or engaging any person in telephone conversation repeatedly or continuously with intent to annoy, abuse, or harass any person at the called number.

c. Here, Defendant violated §§ 1692d and 1692d(5) of the FDCPA by repeatedly contacting Plaintiff on her cellular telephones multiple times a week, and continuing to call Plaintiff after being told to stop calling.

**COUNT III**

24. Defendant's conduct, as detailed in the preceding paragraphs, violated 15 U.S.C. §§ 1692e, 1692e(2) and 1692e(5) of the FDCPA.

a. A debt collector violates § 1692e of the FDCPA by using any false, deceptive or misleading representations or means in

connection with the collection of any debt.

- b. A debt collector violates § 1692e(2) of the FDCPA when it falsely represents the character, amount, or legal status of any debt.
- c. A debt collector violates § 1692e(5) of the FDCPA by threatening to take any action that cannot be legally taken be taken or that is not intended to be taken.
- d. Defendant violated sections § 1692e, 1692e(2)(A), and 1692e(5) of the FDCPA when it misrepresented the legal status of the debt and when it threatened to take legal action it had no intention of taking.

#### COUNT IV

25. Defendant's conduct, as detailed in the preceding paragraphs, violated 15 U.S.C. § 1692f of the FDCPA.

- a. A debt collector violates §1692f of the FDCPA by using unfair or unconscionable means to collect or attempt to collect any debt.
- b. Here, Defendant violated §1692f of the FDCPA engaging in other unfair and unconscionable debt collection practices, including attempting to withdraw money from Plaintiff's

1 banking account without her authorization.

2 **COUNT V**

3  
4 26. Defendant's conduct, as detailed in the preceding paragraphs, violated  
5 15 U.S.C. § 1692g(a) of the FDCPA.

6 a. A debt collector violates section 1692g(a) of the FDCPA by  
7 failing after five days of its initial communication with  
8 Plaintiff, to notify her of her rights to dispute the debt and/or to  
9 request verification of the debt, as well as, providing her with  
10 the amount of the debt and the name of the original creditor.

11  
12 b. Defendant violated § 1692g(a) of the FDCPA when it failed to  
13 send written notification, within five (5) days after its initial  
14 communication with Plaintiff, advising her of her rights to  
15 dispute the debt or request verification of the debt or providing  
16 her with the name of the original creditor and the amount of the  
17 debt.  
18

19  
20 WHEREFORE, Plaintiff, MEGHAN DELONG, respectfully prays for a  
21 judgment as follows:

22 a. All actual damages suffered pursuant to 15 U.S.C. §  
23 1692k(a)(1);  
24  
25

- 1           b.     Statutory damages of \$1,000.00 for the violation of the FDCPA  
2                   pursuant to 15 U.S.C. § 1692k(a)(2)(A);  
3  
4           c.     All reasonable attorneys' fees, witness fees, court costs and  
5                   other litigation costs incurred by Plaintiff pursuant to 15 U.S.C.  
6                   § 1693k(a)(3); and  
7  
8           d.     Any other relief deemed appropriate by this Honorable Court.

9                   **DEMAND FOR JURY TRIAL**

10           PLEASE TAKE NOTICE that Plaintiff, MEGHAN DELONG, demands a  
11 jury trial in this case.

12  
13  
14  
15  
16                   RESPECTFULLY SUBMITTED,

17  
18           Date: 08-28-15

19                   By:   
20                   CRAIG THOR KIMMEL  
21                   Attorney ID No. 57100  
22                   Kimmel & Silverman, P.C.  
23                   30 E. Butler Pike  
24                   Ambler, PA 19002  
25                   Phone: (215) 540-8888  
                    Fax: (877) 788-2864  
                    Email: [kimmel@creditlaw.com](mailto:kimmel@creditlaw.com)